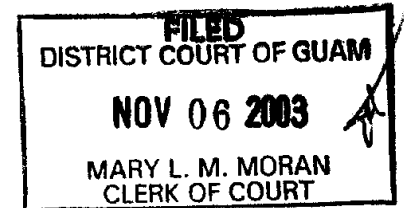


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IN THE DISTRICT COURT OF GUAM

ALAN SADHWANI, LAJU)	CIVIL CASE NO. 03-00036
SADHWANI, and K. SADHWANI'S)	
INC., a Guam corporation,)	
)	
Plaintiffs,)	NOTICE OF EX PARTE
)	APPLICATION AND
v.)	EX PARTE APPLICATION
)	FOR ORDER GRANTING
HONGKONG AND SHANGHAI)	HSBC ADDITIONAL TIME
BANKING CORPORATION, LTD.,)	TO RESPOND TO
et al.,)	COMPLAINT
Defendants.)	
_____)	

TO: PLAINTIFFS, and their attorneys, Arriola Cowan & Arriola

NOTICE IS HEREBY GIVEN that on November ____, 2003, at the hour of ____m., Defendant The Hongkong and Shanghai Banking Corporation Limited ("HSBC") will bring the following Ex Parte Application before the Court.

Concurrently with this Ex Parte Application, HSBC has filed a Motion For Order Granting HSBC Additional Time To Respond To Complaint ("Motion"). It is important and urgent that the Motion be heard as soon as possible because HSBC is obligated to answer or otherwise respond to the Complaint by November 12, 2003. As

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more fully described in the Motion, HSBC and its attorneys have not had adequate time to locate the relevant documentation, meet and confer, and conduct the necessary research and investigation to adequately respond to the Complaint. Further, much of the relevant documentation was delivered to an unrelated third party, Paradise Marine Corporation, upon the sale of the subject loans. HSBC has made a request for additional time to respond to the Complaint to Plaintiffs, but the request was refused. Accordingly, HSBC has no other alternative than to apply to this Court for relief.

This Ex Parte Application is supported by the pleadings previously filed in this case and by the record before this Court. Further grounds are also set forth in the Motion filed concurrently herewith, the Memorandum of Points and Authorities in support of said Motion, and the documents on file herein all being incorporated herein by this reference. This Ex Parte Application is further supported by the Declaration of Jacques A. Bronze concurrently filed herewith.

Dated this 6th day of November, 2003.

LAW OFFICES OF BRONZE & TANG, P.C.
Attorneys for Defendant The Hongkong and
Shanghai Banking Corporation Ltd.

By:


JACQUES A. BRONZE

RAP/nsh